

FILED

Civil Complaint

JUL 19 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

The United States District Court for the Northern District of Ohio

Michael Rypiak,

Plaintiff,

-against-

The United States Federal Government,

Defendant,

COMPLAINT

MAG. JUDGE PARKER

TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

The complaint of the plaintiff, Michael Rypiak, respectfully shows and alleges as follows:

1. The plaintiff, Michael Rypiak, is a resident of the state of Ohio. Residing at 7233 Antoinette Dr, Parma, OH
2. The defendant, The United States Federal Government has a principal place at the Department of Justice
3. Plaintiff Michael Rypiak was a Financial Services intern for the Finance Department for Southwest General Hospital.
4. Employment began May 28th and ended July 3rd after Southwest General Hospital terminated the internship.
5. On the plaintiff's last official working day June 23rd in the office was pulled into the office of Cheryl Hadaam, and let the plaintiff know that the Chief Financial Officer had noticed the plaintiff's feet kicked up on a chair in a closed cubicle while on the Plaintiff's break. Cheryl Hadaam continued to let the plaintiff know that it was not a big deal and nothing more than a learning experience, and truly appreciated all the great work the Plaintiff was doing. The plaintiff responded that he was feeling harassed by the Chief Financial Officer and was too frustrated to talk after staying an hour late to make sure all the work was thoroughly completed before leaving for vacation. Cheryl Hadaam merely responded with ok.

6. On June 3rd the plaintiff received a phone call that lasted 59 seconds from the Defendant's Director of Finance. In approximately the first 20 seconds of the phone call the plaintiff pulled over his motorcycle to properly carry on the conversation. In which he was informed that his position was terminated, and was not given a reason. The plaintiff was only asked if he had any belongings left at the office.
7. The plaintiff full heartedly believes that these actions violate his 14th amendment rights, under the equal protection clause. The general court rulings and practices of the entire United States government making at-will employment an accepted practice. Heavily favoring corporations instead of the American Citizen. Termination of employment will always have a reason, never will someone be fired for the fun of it. At-will employment creates a loophole for corporations to fight in court to hide their discrimination.
8. The plaintiff alleges that these injustices that favor the corporation over the American Citizen demoralizes its own people, and obstructs the liberty of such Citizens to be treated fairly and equally, not based on the color of their skin, gender, reporting harassment, etc.
9. The plaintiff alleges that the very nature of the relationship of employees and employers has not been taken into account. When a corporation unexpectedly loses an employee for reasons not known, minimal to if any financial harm is done to the entire company, and will never be realized as extremely damaging. However, in the case of an employee unexpectedly losing his or her job for reasons unknown that allegedly can be protected rights from firing, can cause an insurmountable amount of financial and mental damage. Not only are there direct effects, such as no ongoing paychecks from that job, but it damages the reputation and the future of that employee. Additionally, this relates to the plaintiff case heavily, as he was a first-time intern, and the termination of that

employment can affect him for potentially decades by hindering the growth from what it initially could have been.

10. By reason of the facts and circumstances stated above, the plaintiff believes he was fired for informally reporting harassment of the Chief Financial Officer to his direct superior Cheryl Hadaam, and the entire United States Federal Government failed to protect the plaintiff's rights by favoring the corporations of America rather than its citizens.
11. By reason of the facts and circumstances stated above, the plaintiff demands judgment against the defendant in the overturning of previous court rulings involving at-will employment, and to set forth a path to closing the loophole that allows corporations to continue discrimination for protected individuals or activities, as well as any other relief the court finds to be just and proper.

Dated July 19th, 2023

Michael Rypiak
Plaintiff
7233 Antoinette Dr,
Parma, OH

Verification

Michael Rypiak, being duly sworn, deposes and says:

I am the plaintiff in the above-entitled action. I have read the foregoing complaint and know that I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

Michael Rypiak

A handwritten signature in black ink, appearing to read "Michael Rypiak", written over a horizontal line.

Notary Public

J. Klimovich 7/19/2023
- see attached -

ACKNOWLEDGEMENT CERTIFICATE

State of Ohio, County of Cuyahoga

The foregoing instrument was acknowledged before me on this July 19, 2023 (date) by
Michael Rypiak (name of person acknowledging).

(Notary Seal)



YEKATERINA KLIMKOVICH
Notary Public, State of Ohio
My Comm. Expires Oct 23, 2023

- Y. Klimkovich
Signature of Notary Public – State of Ohio

My commission expires: 10/23/2023
(date)